



## PETER BROWN & ASSOCIATES, PLLC

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## **Via Electronic Case Filing**

Hon. Jessica G. L. Clarke United States District Judge United States Courthouse 500 Pearl Street New York, New York 10007-1312 September 16, 2024

Re: Raymond Basri v. Richard Gordon and Air99 LLC 23 Civ. 1170 (JGLC) Request for an Adjournment

Dear Judge Clarke,

My firm is co-counsel for Plaintiff, with Robert Lum, Esq. of Lum & Lee, LLP, in the above action. I am writing after conferring with opposing counsel as to the following request.

Defendants filed a motion for Summary Judgment on August 19, 2024. The current Scheduling Order provides for Plaintiff to file its response on September 19, 2024. My firm and co-counsel have worked diligently to meet this schedule but anticipate that because of the complexity of the factual and legal issues in dispute we will be unable to meet the scheduled filing date.

For this reason, I am writing to request that Plaintiff be permitted to file its responsive papers to the Summary Judgment Motion no later than October 3, 2024, and that Defendants' deadline for filing a reply be rescheduled to October 17, 2024.

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I have conferred with opposing counsel, and they have no objection to this application and the proposed filing dates. This is the first application for an adjournment since the motion was filed.

Thank you for your consideration.

Respectfully submitted,

/s/Peter Brown

Peter Brown, Esq.
Peter Brown & Associates PLLC
Co-Counsel for Plaintiff Raymond Basri

cc: All counsel of record (via ECF)

Application GRANTED. Plaintiff's opposition to the motion for summary judgment due October 3, 2024 and Defendants' reply due October 17, 2024.

SO ORDERED.

JESSICA G. L. CLARKE United States District Judge

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Dated: September 17, 2024 New York, New York